

March 17, 1981

Mr. Dale W. Johansen
Assistant Director
Gas Department-Engineering Section
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Dear Mr. Johansen:

This concerns a phone conversation of January 2, 1981, with Ralph Simmons of this Office regarding questions in your letter of December 17, 1980. Your questions concerned the relationship of the equipment described in §192.197(c) with the requirements of §192.739, and the relationship of the relief devices described in §192.197(c)(1) with the requirements of §192.743.

Enclosed is an interpretation of the applicability of the particular sections referred to in your letter.

If I can be of further help in this matter, please let me know.

Sincerely,

Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

NOTE: A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: §§192.197(c) or (c)(1), 192.739, and 192.743

SUBJECT: Pressure regulating and relief installation in high pressure distribution systems.

FACTS: None

QUESTION #1: Are the pressure regulating and relief installations described in §192.197(c) subject to the requirements of §192.739?

ANSWER: The pressure regulating and relief installations described in §192.197 for high pressure distribution systems are those for a service line with meter and service regulator and series regulator, service regulator or other protective devices.

The requirements of §192.739 are for regulating stations such as a city gate measuring and pressure regulating station or a distribution regulator station installed in a gas distribution main regulating a multiple feed distribution system.

Since the pressure regulating and relief devices described in §192.197 are neither a city gate measuring and pressure regulating station nor a distribution regulating station regulating a multiple feed distribution system, they are not subject to the inspection and testing requirements of §192.739.

QUESTION #2. Are the relief devices described in §192.197(c)(1) and (3) subject to the requirements of §192.743?

ANSWER: For the same reasons given in the answer to question #1, the relief devices described in §192.197(c)(1) and (3) would not be subject to the testing requirements of §192.743.

Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

December 17, 1980

Melvin A. Judah
Acting Associate Director
Pipeline Safety Regulation
Materials Transportation Bureau
Department of Transportation
Washington, D.C. 20590

Dear Mr. Judah:

It is requested interpretations be made on the following points of concern in Title 49 CFR, Part 192.

Question #1: Are the pressure regulating and relief installations described in 192.197(c) subject to the requirements of 192.739?

Question #2: Are the relief devices described in 192.197(c)(1) and (3) subject to the requirements of 192.743?

Should you have any questions concerning this correspondence, please feel free to contact Stephen Fischer, Staff Engineer, phone 314/751-3456.

Very truly yours,

Dale W. Johansen, Assistant Director
Gas Department - Engineering Section

NOTE: Phone call to Mr. Johansen. Told him unless he had specific problem, the answer to his questions was that §§192.739 & 192.743 would apply. He was in agreement. Asked for a letter stating that for his file, does not want official interpretation.

R.L.S.

Jan.2, 1981